

December 11, 2025

Ministry of Water, Land, and Resource Stewardship
Government of British Columbia
PO BOX 9012 STN PROV GOVT
Victoria, BC V8W 9L6

Sent via email: PermittingSolutions@gov.bc.ca

Subject: BCAC Response Regarding Expediting Existing Use Groundwater Applications

To Whom It May Concern,

On behalf of British Columbia's farmers and ranchers, BC Agriculture Council (BCAC) appreciates the efforts by the Ministry of Water, Land, and Resource Stewardship to improve permitting under the *Water Sustainability Act* as well as under other relevant legislation and regulations. Water is integral to growing food and other agricultural products that contribute to human well-being. Without reliable access to water, the availability of these goods would be severely affected and so it is vital that our sector is actively engaged in the development of policies governing water use in B.C.

BCAC is the unified voice of our province's agriculture industry, representing over 20,000 farm families and 96% of farmgate sales in B.C. through our 29 member associations. We work to advance policies that support a strong and competitive agriculture sector across B.C. We have also appreciated the opportunity to participate in the Premier's Task Force on Agriculture and Food Economy and believe it is important that the Government of B.C. prioritize implementing the Task Force's recommendation to "...streamline applications for new groundwater use, with low volume users automatically issued authorizations at a threshold at or higher than domestic users."

The persistent backlog of existing use groundwater applications has affected the confidence many farmers and ranchers have in the licensing process as well as agricultural water policy in B.C. more generally. Uncertainty has been heightened by the lengthy timeframes faced by new applicants, who are typically informed by the Ministry that they will not be granted licenses under Section 9 of the Water Sustainability Act until at least 48-60 months have passed since they were notified that their application had been received. This uncertainty contributes to an environment that deters investment in the expansion of farm operations necessary to meet British Columbians' growing demand for locally grown food.

Due to these concerns, BCAC has actively engaged with the Government of B.C. to help identify and implement solutions. We welcome the steps the Ministry has already taken to improve permitting, including the establishment of a new dedicated team to review groundwater applications. It is hoped that our continued feedback will allow for further improvements that increase confidence in the water licensing process.

Currently, the groundwater application requires extensive information from agricultural water users regarding the amounts and kinds of crops grown. Reviewing and verifying this information may require the dedication of significant staff time, contributing to the lengthy timeframes experienced by both new and existing use applicants. Instead using the information provided by the applicant regarding the area to be irrigated, then multiplying that area by the regional rate for irrigating forage crops, would simplify this process for both the applicant and the reviewer, reduce the amount of material to provide and review in

an application, ensure that groundwater licensing is responsive to the realities of farming, and better safeguard watershed health.

Specifically, agriculture in B.C. is incredibly diverse and many farmers grow a wider range of crops than in other Canadian jurisdictions. As such, detailed crop information for individual farm properties can be more difficult to provide in B.C. and much of this information is already available to the Government of B.C. through the Agricultural Land Use Inventories maintained by the Ministry of Agriculture and Food. Some farms also incorporate both field crops and crops grown in greenhouses, further complicating the estimate of the volumes of groundwater needed versus other water sources. Furthermore, farmers may change the variety and location of crops grown in their operation from year-to-year, meaning that the information provided in the initial filing of a groundwater application may no longer be valid by the time that application is reviewed.

Using the regional rate of forage irrigation to determine the volume of water use to authorize would ensure the flexibility necessary to account for these year-to-year changes in farm operations. Forage crops are often more water intensive than other crops, and so a farmer granted a license based on this benchmark would have confidence in knowing the license would reflect any changes in farm practices they might consider in the future. Reducing the authorized volume to a simple calculation could also play an important role in quickly clearing the backlog of existing use applications.

If this change is incorporated, it is important to ensure that earlier applicants' authorized volumes are adjusted to reflect the regional rate for irrigated forage as well. Those whose existing use groundwater applications were reviewed earliest by the Ministry, or who took steps to comply quickly with the requirement to file an application, should not be disadvantaged in comparison to other water users or this would carry the risk of further undermining confidence in the authorization process.

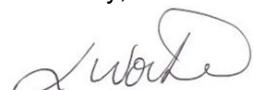
The requirement to provide a Drawing to Scale that meets the Application Drawing Standards as described in the groundwater application form is also quite onerous, complicating both the application process for many farmers and the review for Ministry staff. In rural and remote areas of B.C., where many farms are located, internet connectivity can be limited and so many agricultural producers have reported challenges in uploading a Drawing to Scale that was developed using the Geomark Service or which is a spatial file. There is a strong preference among farmers and ranchers to submit a sketch that Ministry staff can then correlate as needed with the parcel ID and other land details provided earlier in the application.

We believe that making these changes for both new and existing use groundwater applications will assist the Ministry in achieving its stated objectives of clearing the water license application backlog as well as achieving water sustainability and environmental protection. It would also create fairer and more equitable outcomes for agricultural water users participating in the licensing process. Finally, implementing these changes would reinforce confidence in B.C. water policy among farmers and ranchers, advancing the conversation so that is possible to address another important Premier's Task Force recommendation, which is to "incentivize participation in groundwater licensing".

In case of any need for additional information or details regarding our submission in response to this consultation, please do not hesitate to contact Danielle Synotte, BCAC's Executive Director, via email at dsynotte@bcac.ca or via telephone at 604-854-4454.

Thank you once again for this opportunity to contribute the perspective of B.C. farmers and ranchers! We look forward to continued collaboration with the Ministry to implement the Premier's Task Force recommendations and to ensure the sustainable management of our province's precious water resources.

Sincerely,



Jennifer Woike, President
BC Agriculture Council